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FILED

APR 25 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

)

No.

v.

)

19CR 357

SANTO LOZOYA, also known as "Saint,"

)

Violations: Title 18, United
States Code, Sections 1959 and 2

HECTOR ROJAS, also known as "Lil Hec,"

)

JOSE MARTINEZ, also known as "Ghost,"

)

PEDRO NAVARRO, also known as "Cuba"

)

UNDER SEAL

COUNT ONE**JUDGE KENNELLY**

The SPECIAL JULY 2018 GRAND JURY charges:

MAGISTRATE JUDGE COLE

At times material to this Indictment:

1. The defendants, SANTO LOZOYA, also known as "Saint," HECTOR ROJAS, also known as "Lil Hec," JOSE MARTINEZ, also known as "Ghost," and PEDRO NAVARRO, also known as "Cuba," and others known and unknown, were members and associates of the "Milwaukee Kings" street gang, a criminal organization whose members and associates engaged in acts of violence, including acts involving murder, and which operated in or around the North Side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The Milwaukee Kings, including its leadership, membership, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The

Milwaukee Kings enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. The purposes of the Milwaukee Kings enterprise included, but were not limited to, the following:

- a. Acquiring, preserving and protecting power, territory, operations, and proceeds for the enterprise through the use of threats, intimidation, and violence, including, but not limited to, murder, attempted murder, assault with a dangerous weapon, and assault resulting in serious bodily injury;
- b. Promoting and enhancing the enterprise and its members' and associates' activities;
- c. Increasing the status of the enterprise through the use of social media platforms;
- d. Keeping victims, rival gang members, and witnesses in fear of the enterprise and its leaders, members and associates through acts and threats of violence; and
- e. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities.

4. At times relevant to this Indictment, the Milwaukee Kings, through its leadership, membership and associates, engaged in racketeering activity as defined

in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder in violation of the laws of the State of Illinois and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

5. On or about September 2, 2015, at Chicago, in the Northern District of Illinois, Eastern Division,

HECTOR ROJAS, also known as "Lil Hec," defendant herein, for the purpose of maintaining and increasing position in the Milwaukee Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally commit the murder of an individual, namely, Daniel Guerra, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Section 1959(a)(1).

COUNT TWO

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs One through Four of Count One are incorporated here.
2. On or about December 16, 2016, at Chicago, in the Northern District of Illinois, Eastern Division,

JOSE MARTINEZ, also known as "Ghost," and
SANTO LOZOYA, also known as "Saint,"

defendants herein, for the purpose of maintaining and increasing position in the Milwaukee Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally commit the murder of an individual, namely, Crispin Coliz, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT THREE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs One through Four of Count One are incorporated here.
2. On or about April 27, 2017, at Chicago, in the Northern District of Illinois, Eastern Division,

PEDRO NAVARRO, also known as "Cuba," defendant herein, for the purpose of maintaining and increasing position in the Milwaukee Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally commit the murder of an individual, namely, Xavier Soto, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT FOUR

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs One through Four of Count One are incorporated here.
2. On or about April 27, 2017, at Chicago, in the Northern District of Illinois, Eastern Division,

PEDRO NAVARRO, also known as "Cuba," defendant herein, for the purpose of maintaining and increasing position in the Milwaukee Kings, an enterprise engaged in racketeering activity, did knowingly attempt to commit the murder of an individual, namely, Victim 1, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FIVE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs One through Four of Count One are incorporated here.
2. On or about April 27, 2017, at Chicago, in the Northern District of Illinois, Eastern Division,

PEDRO NAVARRO, also known as "Cuba," defendant herein, for the purpose of maintaining and increasing position in the Milwaukee Kings, an enterprise engaged in racketeering activity, did knowingly attempt to commit the murder of an individual, namely, Victim 2, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

A TRUE BILL:

F O R E P E R S O N

UNITED STATES ATTORNEY